Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	

COMMENTS OF U S WEST, INC.

Kathryn Marie Krause
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2859

Attorney for
U S WEST, INC.

Of Counsel.
Dan L. Poole

March 31, 1997

SUMMARY

In these Comments U S WEST responds only to the Commission's request for comment on the use of the 711 abbreviated dialing code for access to Telephone Relay Services and reserves the right to respond to other issues in reply.

U S WEST agrees with the Commission that "certain issues related to technical and operational capability, cost, and competition, must be resolved before a nationwide N11 code for TRS access can be implemented."[1]

The technical feasibility and costs will need to be determined based on the Commission's decisions regarding the complexity of the access to be provided from the simplest switch-based abbreviated dialing of a TRS center to a "gateway" real-time selection of various disability services, including Telephone Relay Services. The differences in terms of time and cost may vary substantially, and, until more specifics are known, U S WEST cannot provide cost projections or confirm whether a three-year deployment period is reasonable.

[1] First Report and Order ¶ 55.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	

COMMENTS OF U S WEST, INC.

I. INTRODUCTION

Herein, U S WEST, Inc. ("U S WEST") responds to only a single item on which the Federal Communications Commission ("FCC" or "Commission") requests comment in its Further Notice of Proposed Rulemaking:[1] the use of the abbreviated dialing code 711 with respect to Telephone Relay Services (or "TRS"). We reserve the right to respond to other issues in reply, particularly to those comments dealing with the sale or transfer of abbreviated dialing codes other than N11 codes.

II. 711 AND TRS USE

In its First Report and Order, the Commission concluded that an N11 Code, specifically 711, should be assigned for TRS use within three years of the effective date of the Order.[2] The Commission envisions that this code will be used primarily for access by "individuals with hearing or speech disabilities to TTY" facilities,[3]

---

[1] In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, First Report and Order ("First Report and Order" or "Order") and Further Notice of Proposed Rulemaking, FCC 97-51, rel. Feb. 19, 1997 ("Further Notice").

[2] First Report and Order ¶ 55.

[3] Id.

noting that it should operate to reduce the time a call takes to be completed (by reducing the number of digits needed to be dialed in the first instance) and should provide a common number nationwide for TRS access.[4]

In its Further Notice, the Commission seeks comment on the feasibility of establishing a nationwide 711 dialing capability for TRS services, particularly in the time frame proposed (i.e., three years).[5] The Commission seeks comment not only on the technical feasibility of deploying such a dialing pattern, but on the projected costs of implementation, the effect on competition among TRS providers, and the effect such a dialing pattern would have on CMRS providers.[6]

The Commission notes that there could be two potential types of 711 abbreviated dialing deployment. The first, a switch-based deployment, that would simply direct all 711 calls from a single switch to a single TRS provider (presumably the state-selected provider). In such a configuration, when a TRS user dialed the 711 code, the telecommunications carrier's end-office switch would automatically route the call to the state-selected relay center.[7]

In addition to this switch-based architecture, the Commission envisions another type of architecture as feasible, utilizing intelligent network ("IN") or advanced intelligent network ("AIN") capabilities. Utilizing this type of architecture, the Commission wonders if some type of "gateway" offering might be

---

[4] Id. ¶ 56.

[5] Id. ¶¶ 67-68.

[6] Id. ¶ 67.

[7] Id. ¶ 68.

provided that would permit calling parties to access "multiple TRS providers."[8] The Commission also inquires as to "whether any other important disability services could be accessed through the same gateway" consistent with the goals of Section 255 of the Telecommunications Act of 1996 ("1996 Act" or "Act").[9]

A. Technical Feasibility

Nationwide access to a preselected TRS provider is technically feasible, using either a switch-based or AIN-based solution. Deploying switch-based 711 dialing to TRS centers would be feasible in virtually all switches today.[10]

Use of an AIN-based solution is also feasible for most switches, although it would be more difficult and more costly to deploy.[11] In this arrangement, a subscriber would dial 711, which would trigger an AIN database query. The query response would contain an 800 number that would correspond to the subscriber's "TRS Provider of Choice" ("TRSPC"). Once the switch number that launched the

---

[8] Id. The Commission states that "[w]ith such a gateway, a database query would be launched, and parties would be able to select their TRS providers, or parties would have their calls routed to a presubscribed TRS provider." Id. See further discussion below around the lack of definition associated with such a "gateway."

[9] Id.

[10] This capability would not be available in some electromechanical offices (e.g., SXS). Also, neither 711 nor the current 800 numbers used for TRS (see the Commission's reference to these numbers, allocated for TRS access by the Industry Carriers Compatibility Forum ("ICCF") of the Alliance for Telecommunications Industry Solutions ("ATIS") at ¶ 55), will work with coin phones on a coin-sent-paid basis.

[11] Offices that do not have AIN capability can route their N11 calls to a tandem equipped with such capability. There will be some additional cost incurred to do this.

query has the 800 routing number, the call would be automatically routed to the chosen TRS provider.

With respect to a wireless CMRS deployment of 711 TRS access, U S WEST is not aware of any CMRS provider that currently can accommodate through their handsets persons needing TTY access.[12] Thus, it seems unlikely that persons with speech and hearing impairments would be utilizing CMRS in placing 711 calls. Beyond the current lack of market participation, however, U S WEST advises that our Personal Communications Services ("PCS") switches can route 711 calls where all the 711 calls involving a switch are sent to a preselected TRS provider.

B. Threshold Issues Associated With A 711 TRS Access Deployment

There are many issues that need to be resolved before 711 access to TRS could be deployed. First, each subscriber line would have to have access to TRS *via* an N11 code. This would require storing routing information (the TRS provider's 800 number) for each TRS provider wishing to be included in a database. Once the potential volume of TRS providers to be included was known, carriers (such as U S WEST) would need to determine whether to use a switch-based solution or a database solution. If the latter approach is taken, a decision would need to be made regarding whether to build a new database or attempt to provision the TRS access *via* an existing database (such as LIDB).[13]

---

[12] This means that the wireless handsets are lacking the interface necessary to couple with TTY equipment.

[13] Preliminarily, U S WEST believes that the latter would be the better choice, since the LIDB already contains the subscriber record information. While such

A decision would also need to be made regarding "how" subscribers would make their TRS preference known. U S WEST would propose that, rather than a balloting process (which can be very expensive), subscribers initially (i.e., at the switch cut over) would have the 711 code mapped to the state-authorized TRS provider. After the initial default setting was in place, public-service-type advertisements (in various media) could be utilized to alert customers about their ability to change providers. Since TRS providers will be gaining revenue from customers who utilize their services, they would have a substantial incentive to market their services vigorously. Subsequent to the initial "default" deployment, a subscriber wishing to change his/her "default" status could notify carriers and the appropriate change could be made.

Until more specifics are known about the actual configuration of a proposed 711/TRS access system, U S WEST is not in a position to provide cost projections or confirm whether a three-year deployment schedule is reasonable. Clearly, however, the "simpler" the deployment, the lower the costs would be and the quicker the deployment.

U S WEST has reason to believe that a "simpler-is-best" approach to 711/TRS access is, in fact, what the users of that system desire. However, it is not clear from the Commission's discussion of this issue whether the Commission shares that position. We address this issue further below.

---

information would need to be modified to adapt to a TRSPC database, it would not need to be recreated from scratch.

C. Competition In The TRS Market And Customer Choice

Because it is unclear just what the primary motivating force is behind the Commission's tentative conclusions with respect to 711 and TRS access, it is difficult to craft a response that will best provide the Commission with the information it needs. If providing persons with hearing and speech impairments easy access to their TRSPC is the overriding goal, then a system such as that described above would clearly advance the goal. However, if the Commission is striving for some kind of "spontaneous consumption" of TRS providers, across all premises and including all providers, the task is much more formidable and the costs predictably more significant.

More important, perhaps, than the mere technical feasibility of establishing such a system is the question of whether anyone wants such a system. Based on our conversations with individuals with speech or hearing impairments and those who represent persons with speech and hearing impairments, U S WEST's understanding of what those individuals want is the ability to determine (on something like a presubscription basis) the TRS provider associated with their station. This allows them to avoid dialing long streams of digits.

Crafting a 711/TRS solution to meet the above need, however, would not allow a person with a speech or hearing impairment to necessarily access their TRSPC in all circumstances, such as when dialing 711 from someone else's station. Just as any individual who is away from his/her "home station" must "dial around"

to his/her long distance carrier of choice, a person with a hearing or speech impairment at someone else's station would have to do the same.[14]

Furthermore, while the technical solution described above by U S WEST clearly allows for competition in the TRS market (by allowing individuals to "sign up" for their TRS provider of choice), it does not allow for any type of real-time or "on-line" TRS competition. That is, once having chosen to be served by one TRS provider, a person with a speech or hearing impairment would not be in a position (through a "gateway," "menu," or other means) to spontaneously make a different choice.[15]

While there would not be "spontaneity of choice," U S WEST does not believe that persons with hearing or speech impairments are looking for that type of choice or capability. Rather, they are looking to be able to "choose" a TRS provider from

---

[14] Even a national database of TRS providers and their associated information would not get around this matter unless the activation of the query from a calling party was somehow associated with some type of Personal Identification Number ("PIN"). Clearly, this would add additional dialing requirements. And, the fact that such a system is not in place for the general calling public strongly suggests that the costs of deploying such a mechanism would far outweigh the consumer benefits. Compare the Billed Party Preference ("BPP") proceeding comments and cost/benefit analyses submitted therein with respect to "preferential" dialing from aggregator and coin phones. Certainly a proposal that would incorporate the idea of "calling party preference," in other than a dial-around mode, would involve costs significantly greater than those quoted for BPP. It is inconceivable that the benefits to the public would outweigh such costs.

[15] Because U S WEST is unsure what the Commission thinks a "gateway" N11 would look like or how it would operate, U S WEST cannot intelligently address whether such a gateway might bring additional benefits to persons having all types of impairments, so as to advance any Section 255 goals.

among a number of existing (and already competitive) sources.[16] If that is the real market demand, and U S WEST believes that it is, requiring callers to "go through a menu" each time they place a call would be as burdensome as the current process is alleged to be (i.e., the dialing of ten or more digits).[17]

While allowing customer choice will advance competition in the TRS market by making access to various TRS providers more easily available, that choice should not be met through a model determined to advance "spontaneous consumption" among the competing providers. Before any decision might be made to proceed down the road of accommodating such consumption, the Commission should fully understand any policy issues associated with the decision, be aware of the costs associated with such a model, and assure itself -- and the industry -- that there is sustainable market demand for such purchasing patterns that would allow for complete cost recovery.

III. CONCLUSION

Through these Comments, U S WEST would hope the Commission learns what the TRS users need and envision for the use of the 711 code. The Commission needs to determine what goals it is trying to achieve with the assignment of the 711 abbreviated dialing code for access to Telephone Relay Services: to simplify and

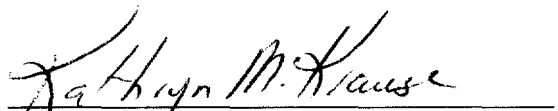
---

[16] Often that choice will reflect itself as a decision not to use a particular state's "chosen" TRS provider, but to use a different provider that better meets their particular needs. The policy issues associated with this matter are not clear at this time. We expect that entities will comment on this issue and, if appropriate, we will respond in reply.

provide consistency for TRS users dialing and/or competition for TRS providers. The three scenarios (simple access to a TRS center; preselection for choice of a TRS providers; or real-time choices (a "gateway") of TRS providers and other disability services) each has different degrees of technical issues, operational capabilities, and questions regarding its use and implementation that must be answered before nationwide technical feasibility in the three-year time frame and costs can be determined.

Respectfully submitted,

U S WEST, INC.

By: 

Kathryn Marie Krause
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2859

Its Attorney

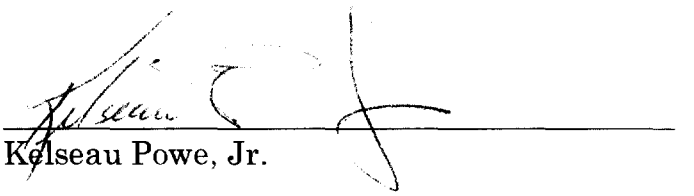
Of Counsel,
Dan L. Poole

March 31, 1997

[17] There is an additional technical issue associated with the concept of a "gateway" or "menu." Baudot will not work in responding to a menu, because it does not use standard network signaling tones, i.e., DTMF.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 31st day of March, 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be served via hand-delivery upon the persons listed on the attached service list.



Kelseau Powe, Jr.

(CC92105b.KK/h)

James H. Quello
Federal Communications Commission
Room 802
1919 M Street, N.W.
Washington, DC 20554

Reed E. Hundt
Federal Communications Commission
Room 814
1919 M Street, N.W.
Washington, DC 20554

Susan P. Ness
Federal Communications Commission
Room 832
1919 M Street, N.W.
Washington, DC 20554

Rachelle B. Chong
Federal Communications Commission
Room 844
1919 M Street, N.W.
Washington, DC 20554

Regina M. Keeney
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

Janice M. Myles
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

Gloria Shambley
Federal Communications Commission
Room 235
2000 L Street, N.W.
Washington, DC 20036

Elizabeth Nightingale
Federal Communications Commission
Room 210-K
2000 M Street, N.W.
Washington, DC 20554

(Including 3 x 5 Diskette w/Cover Letter)

(CC92105b.KK/lh)
Last Update: 3/27/97

International Transcription
Services, Inc.
Suite 140
2100 M Street, N.W.
Washington, DC 20037